



CENTRAL COAST LONG-TERM ENVIRONMENTAL ASSESSMENT NETWORK

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May 26, 2009



Ms. Mary Adams
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401



RE: Proposed Revisions to the 303(d) List of Impaired Water Bodies in the Central Coast Region

Dear Ms. Adams:



I am writing to offer several comments on the referenced proposed revisions to the 303(d) list of impaired water bodies in the Central Coast region. First, I want to express my appreciation for the herculean effort required to develop this document. As you know, water quality problems, especially in the marine environment, invariably reflect adverse human activities on land that require complex regulatory and stakeholder processes to correct. Consequently, designating water bodies as impaired requires solid data with a high level of quality control and is often the first step in ensuring that all designated beneficial uses are supported.



As you know, the Central Coast Long-term Environmental Assessment Network (CCLEAN) has been collecting data since 2001 on the concentrations of contaminants in rivers, streams and Monterey Bay waters, as well as in resident mussels and sediments in Monterey Bay. We have a rigorous Quality Control program and operate under a Quality Assurance Program Plan that complies with the Surface Water Ambient Monitoring Program. CCLEAN is also the only program that is consistently measuring persistent organic pollutants, such as polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs) and chlorinated hydrocarbon pesticides, such as DDTs, in the waters, sediments and organisms of Monterey Bay. For these reasons, I am surprised that none of the CCLEAN data or reports that were submitted to you were apparently used in support of the proposed 303(d) list revisions.



As this may have been an oversight, I urge you to review the CCLEAN Program Overview for 2001-2006 (www.cclean.org), as previously submitted to you,

which suggests a number of impaired water bodies, especially regarding beneficial uses for coastal shellfish harvesting and consumption of water and organisms in several rivers. As documentation of these possible impairments, I am sending you under separate cover data on concentrations of the chlorinated hydrocarbon pesticide Dieldrin in mussels and concentrations of Chlordane, Dieldrin, p,p'DDT, p,p'DDE, p,p'DDD and PCBs in several rivers in the Monterey Bay area. I would be happy to answer any questions you might have about these data.

I would also like to offer a suggestion for how the transparency of the 303(d) listing process could be improved. The data files that are linked to each proposed action do not have any site information and readers can only determine which data are supporting a proposed action if they have prior knowledge about the site codes for the program(s) that provided the data.

Thank your for your consideration in these matters.

Sincerely,

A handwritten signature in black ink that reads "Dane Hardin". The signature is written in a cursive, slightly slanted style.

Dane Hardin
Director